

# **EXHIBIT D**

Confidential



## Transcript of **Nancy Hart**

Sunday, April 10, 2022

*National Coalition on Black Civic Participation, et al. v. Jacob Wohl, et al.*

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Reference Number: 115309

1 IN THE UNITED STATES DISTRICT COURT  
2 FOR THE SOUTHERN DISTRICT OF NEW YORK

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4 NATIONAL COALITION ON BLACK CIVIC PARTICIPATION, MARY  
5 WINTER, GENE STEINBERG, NANCY HART, SARAH WOLFF, KAREN  
6 SLAVEN, KATE KENNEDY, EDA DANIEL, and ANDREA SFERES,

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7 Plaintiffs

8

9 -and-

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11 People of the STATE OF NEW YORK, by its attorney general,  
12 LETITIA JAMES, ATTORNEY GENERAL OF THE STATE OF NEW YORK

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-vs-

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14 JACOB WOHL, JACK BURKMAN, J.M. BURKMAN & ASSOCIATES, LLC  
15 PROJECT 1599, MESSAGE COMMUNICATIONS, INC., ROBERT MAHANIAN,  
16 and JOHN and JANE DOES 1-10,

15

Defendants.

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18 Deposition of NANCY HART, Plaintiff, herein taken by  
19 Defendant, pursuant to Notice via Zoom, on Sunday, April  
20 10th, 2022 at 10:00 a.m., before Paula D. Bielat, a  
21 shorthand reporter and notary public within and for the  
22 State of New York.

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1 APPEARANCES :

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ORRICK HERRINGTON & SUTCLIFFE, LLP

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1 Q And how about after the November 2020  
2 presidential election, did you vote in any local  
3 or state elections in-person?

4 A Yes.

5 Q Which ones?

6 A Every one that we've had.

7 Q Who did you vote for in the 2020 presidential  
8 election?

9 A Biden.

10 Q So is it fair to say you were happy with the  
11 result of the election?

12 A Yes.

13 Q Are you still happy with the result of the  
14 election?

15 A Yes.

16 Q Are you involved with any type of political club  
17 or organization?

18 A No.

19 Q What, if anything, do you do personally to  
20 support the local black community?

21 MR. GOLD: Objection.

22 THE WITNESS: I spend a great deal of time trying to  
23 promote causes that will benefit  
24 people I know within the black  
25 community through my work.

1 A Yes.

2 Q So it's your understanding that they do?

3 A Yes.

4 Q What, if anything, do you know about procedures  
5 police departments use to enforce outstanding  
6 warrants?

7 A I don't know quite as much. I do know that in  
8 general they rely on informants, they rely on,  
9 again, public databases, telephone books to track  
10 down people with warrants. In general the amount  
11 of effort expended is relevant to the amount of  
12 severity of the crime.

13 Q Do you know every method that police departments  
14 use to enforce outstanding warrants?

15 A I do not.

16 Q Have you ever worked with a police warrant  
17 enforcement unit?

18 A No, I have not.

19 Q Do you support law enforcement, Ms. Hart?

20 MR. GOLD: Objection.

21 THE WITNESS: I do.

22 MR. KLEINMAN: Do you work with law enforcement in  
23 your current job, in your current  
24 role?

25 THE WITNESS: On occasion.